

*EPA has revised the 2014 Record of Decision to reflect updated information about reduced cancer risk from one of the chemicals in the river sediment.*

## What is changed

In February of this year, EPA invited public comment on a proposed change to the amount of cancer-causing polycyclic aromatic hydrocarbons (cPAHs) that would be allowed to remain in the Lower Duwamish Waterway sediments. A 2017 decision by EPA scientists determined that one of the cPAH chemicals – BaP – was seven times less cancer-causing than was previously thought.

The 2017 BaP decision followed a review process that started in 2011 and included input from the public and from independent scientists, including researchers at the University of Washington. The results of this decision are now being used across the country to assess cancer risks from mixtures of cPAHs.

## Public comments

We received comments from hundreds of people and several organizations on the proposed change to the cPAH cleanup levels in the Lower Duwamish Waterway Record of Decision (ROD). We read and considered every comment. Many commenters were concerned that a change to the 2014 ROD for the Lower Duwamish Waterway would put their health and the environment at risk. Some commenters didn't agree with the science behind the assessment of cPAHs. Most asked us not to change the cleanup level in the 2014 ROD, and a few supported the change.

EPA Region 10 did not receive information during the comment period that would lead us to change the Explanation of Significant Differences. We have finalized the ESD which revises the cleanup levels and remedial action levels in the 2014 ROD for cPAHs, including BaP, in sediments, and the target level of cPAHs in clam tissue. The changes are based on the updated scientific information about how much exposure it takes for BaP to increase cancer risks for people. The revised cleanup levels are higher but, because the health risk from BaP is lower, the cleanup will continue to be as protective as described in the 2014 ROD.

A summary of the comments we received during the public comment period (February 4 – April 21, 2021) and our responses to them are available in the Responsiveness Summary section of the final Explanation of Significant Differences. The comments we received and other decision documents are available on EPA's website [www.epa.gov/superfund/lower-duwamish](http://www.epa.gov/superfund/lower-duwamish).

## Environmental Justice

The decision to change the 2014 ROD does not change our commitment to environmental justice in this community as we move forward with cleanup. EPA includes the community and other stakeholders in a remedial design Roundtable, we routinely meet with the Community Advisory Group, and EPA staff is available to answer questions and discuss our work on the Lower Duwamish Waterway. We work actively with our federal, state, tribal and local partners; and the responsible parties, to reduce risks by:

- Completing early cleanup actions;
- Designing the remaining cleanup work required in the ROD;
- Engaging affected communities in the cleanup process;
- And developing culturally appropriate ways to encourage safer seafood choices.

## How the change affects the cleanup

PCBs are the main source of risk to people's health from the Lower Duwamish Waterway Superfund site. There is no change to the PCB cleanup level in this ESD. People can be exposed to PCBs if they eat fish and shellfish that spend their lives in the river, or contact sediment during beach play, net-fishing, and clamming. Cleanup to reduce PCBs will reduce cPAHs, too. Areas where cleanup is defined by levels of PCBs include most areas where cPAHs are found. This means that the ESD update to the 2014 ROD changes the areas to be cleaned up by approximately three percent.

The 2014 ROD estimated where dredging, capping, and enhanced natural recovery would be required based on data collected before and during the remedial investigation and feasibility study. The cleanup will take place in three phases, starting at the south end of the waterway. As each phase of cleanup proceeds, new samples will be collected and used to refine and update cleanup areas. Pollution levels are going down due to improved pollution source control, early action area cleanups, and the ongoing deposition of cleaner sediment from the Green River upstream.

## For more information about the Lower Duwamish Waterway

**Learn more about EPA's work** on the Lower Duwamish Waterway Superfund Site:

[www.epa.gov/superfund/lower-duwamish](http://www.epa.gov/superfund/lower-duwamish)

Review the **document collection** maintained by the Lower Duwamish Waterway Group:

<https://ldwg.org>

For questions about the Explanation of Significant Differences or our work on the Lower Duwamish Waterway please contact Project Manager **Elly Hale** • [hale.elly@epa.gov](mailto:hale.elly@epa.gov)

To learn about the **Lower Duwamish Roundtable**, a forum for those affected by the Lower Duwamish Waterway Superfund Site: • <https://www.duwamishwaterwayroundtable.org>

For questions about EPA's community involvement work at the Lower Duwamish Waterway Superfund Site contact **Kay Morrison**: • [morrison.kay@epa.gov](mailto:morrison.kay@epa.gov)

If you need materials in an alternative format, please contact Kay Morrison • 800-424-4372, ext. 8321

